

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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BATALLA VIDAL, Martín Jonathan  
v.  
Baran, et al

AFFIDAVIT OF Clement Lee  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL *PRO HAC VICE*  
1:16-CV-04756-NGG-JO

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State of New York  
County of Kings

Clement Lee, being duly sworn, hereby deposes and says as follows:

1. I am an associate with the law firm of Make the Road New York.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificate(s) of Good Standing annexed hereto I am a member in good standing of the Bar of the State(s) of New York.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore your affiant respectfully submits that s/he be permitted to appear as counsel and advocate *pro hac vice* in this one case for Plaintiff/Defendant Martín Jonathan Batalla Vidal.

Dated: 8/30/2016

NOTARIZED

Antonia M D House

ANTONIA M D HOUSE  
Notary Public, State of New York  
Reg. No. 02HO6334411  
Qualified in Kings County  
Commission Expires December 14, 2019

Clement Lee

Signature of Movant

Firm Name Make the Road New York

Address 92-10 Roosevelt Ave.

Jackson Heights NY 11373

Email clement.lee@maketheroadny.org

Phone (718)418-7690

Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department

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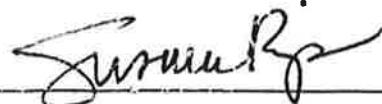
I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

**CLEMENT KAI LEE**

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on April 9, 2012, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of this court on

August 23, 2015



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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BATALLA VIDAL, Martín Jonathan v. Baran, et al.

NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE  
1:16-cv-04756-N

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TO: Opposing Counsel  
NOT YET ASSIGNED  
NOT YET ASSIGNED

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate(s) of Good Standing annexed thereto, we will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of Make The Road New York and a member in good standing of the Bar(s) of the State(s) of New York, as attorney pro hac vice to argue or try this case in whole or in part as counsel for Plaintiff/Defendant BATALLA VIDAL, Martín Jonathan. There are no pending disciplinary proceedings against me in any State or Federal court. (If there are any disciplinary proceedings, describe them.)

Respectfully submitted,



Dated: August 29, 2016

Signature of Movant  
Firm Name Make The Road New York

Address 92-10 Roosevelt Ave.

Jackson Heights, NY NY 11373

Email Clement.lee@maketheroadny.org

Phone (718) 418-7690

VANESSA DELL  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 02DE6312477  
Qualified In Kings County  
My Commission Expires October 06, 2018